**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

MALIKIE INNOVATIONS LTD., and KEY PATENT INNOVATIONS LTD.	
Plaintiff,	CASE NO. 7:25-CV-00222-DC-DTG
v.	JURY TRIAL DEMANDED
MARA HOLDINGS, INC. (F/K/A MARATHON DIGITAL HOLDINGS, INC.)	
Defendants.	

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the First Amended Scheduling Order (Dkt. 50) and Court's Standing Order Governing Proceedings (OGP)—Patent Cases, Plaintiffs Malikie Innovations Ltd. and Key Patent Innovations Ltd. ("Plaintiffs") and Defendant MARA Holdings, Inc. ("Defendant") hereby submit the following Joint Claim Construction Statement.

I.   Disputed Constructions

#	Term	Proposed By	Plaintiffs' Proposed Construction	Defendant's Proposed Construction
1	"Montgomery-style reduction" '286 Patent, Claim 1	Defendant	This term appears only in the preamble and is not limiting.	"reduction that proceeds by clearing the least significant portions of an unreduced operand and leaving the remainder in the more significant portions"
2	"perform a replacement of a least significant word of the operand" '286 Patent, Claim 1	Defendant	"replace a word that makes the smallest contribution to the value of the operand"	"add a modular equivalent of the operand's least significant word to the more significant words of the operand such that the result can be shifted down to drop the least significant word"
3	"perform a cancellation thereof" '286 Patent, Claim 1	Defendant	"add a multiple of the modulus to the operand to eliminate the least significant word of the operand"	"add a multiple of the modulus to the operand such that the least significant word of the result is zero and the result can be shifted down to drop the least significant word"
4	"finite field operation" '960 Patent, Claim 3 '062 Patent, Claim 1	Defendant	"operation in a finite field"	"operation where each operand is a finite field element"
5	"reduced result" '960 Patent, Claim 3 '062 Patent, Claim 1	Plaintiff	"result of performing the claimed modular reduction"	No construction needed. Plain and ordinary meaning.
6	"unreduced result" '960 Patent, Claim 3	Plaintiff	"result without performing the	"result without any reduction to a specific

#	Term	Proposed By	Plaintiffs' Proposed Construction	Defendant's Proposed Construction
	'062 Patent, Claim 1		claimed modular reduction"	finite field or wordsize reduction"
7	"the electronic message omits a public key of a signer" '370 Patent, Claim 1	Defendant	Plain and ordinary meaning.	"the electronic message does not include any representation of the public key of the signer"
8	"verifying that the second elliptic curve point Q represents the public key of the signer" '827 Patent, Claim 2	Defendant	Plain and ordinary meaning.	"verifying that the second elliptic curve point Q represents the second elliptic curve point Q"
9	"random number generator" '961 Patent, Claims 1, 2	Both Parties	"computer instructions capable of generating values according to a uniform random probability distribution"	"a system or algorithm that generates a random value"
10	"seed" '961 Patent, Claims 1, 2	Defendant	"a value obtained from a random number generator that is used to as the starting value for a cryptographic key generation function"	"a random value that is used as the starting value for a cryptographic key generation function"
11	"The method of claim 1 wherein if said output is rejected, said output is incremented by a deterministic function and a hash function is performed on said incremented output to produce a new output; a determination being made as to whether said new output is acceptable as a key." '961 Patent, Claim 7	Defendant	Not indefinite.	Indefinite.

II.   Agreed-to Constructions

#	Term	Agreed-to Construction
1	"word" '286 Patent, Claim 1	"unit of data (in bits) that that a computer processor can handle in a single operation"
2	"least significant word" '286 Patent, Claim 1	"word that makes the smallest contribution to the value of the operand"
3	"machine word" / "word" / "words" '960 Patent, Claim 3 '062 Patent, Claim 4	"unit of data (in bits) that a computer processor can handle in a single operation"
4	"generator" '827 Patent, Claim 1 '370 Patent, Claim 1	"a point (denoted as G) in a group such that every other point in the group is a multiple of G"
5	"which provides for an accelerated verification of the received signature" '370 Patent, Claim 1	Not limiting.
6	"mod q" '961 Patent, Claim 1	"computing the remainder of dividing a number by q"
7	"output H(SV)" '961 Patent, Claim 1	"output of performing hash function H( ) on the seed value SV"

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document

has been served on February 13, 2026, to all counsel of record.

/s/ *Mark D. Siegmund*
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